

Peter Szanto 949-887-2369
11 Shore Pine
Newport Beach CA 92657

U.S. BANKRUPTCY COURT

DISTRICT OF OREGON

1050 SW 6th Ave #700 Portland, OR 97204 (503) 326-1500

In Re Peter Szanto,

Debtor

16 –bk-33185 pcm7

DEBTOR’S Unopposed

Motion to Postpone

Hearing of 11/26/19

1. Debtor's Certification Relating to Pre-filing Conferral **(Certification Pursuant to LBR 7007-1 (a))**

Pursuant to the Local Rule regarding conferral, Debtor contacted the counsel for Bank of America, Mr. Scott, regarding postponement of the hearing of 11-26-19 [EXHIBIT A]. Mr. Scott was in agreement that the current date of 11-26-19 was inconvenient for him as well [EXHIBIT B].

Thereupon, the parties agree that the 11-26-19 hearing should be postponed.

16-bk-33185

Motion –

pg. 1

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2 I certify under penalty of perjury under the laws of the United States,
3 that foregoing is true and correct. Signed at Irvine CA

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5 Dated 11/19/ 2019 /s/ signed electronically Peter Szanto

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8 **2. FACTS**

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10 The parties agree that the 11-26-19 hearing regarding relief from
11 stay is inconvenient for them both and so Debtor makes this unopposed
12 motion for postponement.

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15 **3. MEMORANDUM**

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17 11 USC § 105 empowers this Court to “issue any order, process, or
18 judgment that is necessary or appropriate to carry out the provisions of this
19 title.”

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21 Here, what the Court is requested to do is postpone the hearing of
22 11-26-19 because both sides are otherwise previously obligated and are
23 unable to attend.

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25 Debtor’s inability to attend the hearing of 11-26-19 rises to the level

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2 of an impossibility, because he will be travelling by air, cross-country, the
3 entire day and will not even have access to phone service.
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6 **4. Conclusion**
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8 For the reasons enumerated, and other reasons to be explained
9 by testimony at any hearing which may be scheduled, Debtor prays for an
10 unopposed postponement of the hearing of 11-26-19.
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12 Respectfully,
13

14 Dated 11/19/ 2019 /s/ signed electronically Peter Szanto
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2 **PROOF of SERVICE**
3

4 My name is Maquisha Reynolds, I am over 21 years of age and not a party to
5 the within action. My business address is PO Box 14894, Irvine CA 92623
6

7 On the date indicated below, I personally served the within: **Motion**
8 on the following by placing in postage pre-paid envelopes of the within
9 document and mailing same:

10 a. Internal Revenue Service, PO Box 7346, Philadelphia PA 19101

11 b. First Service Residential, 15241 Laguna Canyon Rd, Irvine CA 92618

12 c. JPMorgan BofA Bank, represented by:

13 Gadi Shahak c/o Shapiro & Sutherland

14 1499 SE Tech Center Place, Suite 255 , Vancouver, WA 98683

15 d. Bank of America, c/o McCarthy & Holthus 920 SW 3rd Av., Portland OR 97204

16 e. Oregon Department of Revenue, 955 Center St., Salem OR 97301

17 f. Chapter 7 Trustee, Ms Amborn, PO Box 580, Medford, OR 97501

18 g. Susan Szanto - 11 Shore Pine, Newport Beach CA 92657

19 h. Office of the US Trustee, 620 SW Main Street, Suite 213, Portland, OR 97205

20 by mailing copies to the above parties *via* 1st class mail, postage prepaid, or by
21 e-mail.
22

23 I declare under penalty of perjury under the laws of the United States
24 that the foregoing is true and correct. Signed at Irvine CA.
25

26 Dated 11/19/ 2019 /s/ signed electronically M. Reynolds
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